

October 25, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, GN
Docket No. 16-142

Dear Ms. Dortch,

Innovation is critical to supporting any industry's future by enhancing competition and expanding possibilities. It brings consumers more value by introducing features, services and devices that become an integral part of consumers' lives.

That is why, as broadcasters, we are extremely excited about the promise of Next Gen TV. We write to dispel some unfortunate myths regarding the costs and benefits of Next Gen for consumers.

First, Next Gen TV will not raise prices for pay-TV viewers. It is an improvement to our free, over-the-air service to consumers, providing even better-quality video and audio along with enhanced emergency alerting capabilities, better reception, and new interactive features. Broadcasters have no control over how cable providers choose to price their services to maximize their profits, and no aspect of Next Gen TV requires MVPD fees to increase.

Second, consumers will not need to buy new TV sets to continue to view over-the-air television. Viewers will be able to receive the same great programming on their existing sets with no modifications if they so choose. Viewers who want to experience the benefits of Next Gen without buying a new TV set will be able to use gateways or small and inexpensive devices that plug into their existing TV sets. Moreover, broadcasters are committed to working together to ensure that content is provided in both the current digital television standard as well as Next Gen for the foreseeable future; in fact, the Joint Petition filed by America's Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters specifically requires it.

The desire for innovation is why the government is continually looking for new spectrum bands to set aside for 5G Wireless technologies and unlicensed use. Of course, consumers need to upgrade their technology to take advantage of such innovation - for example by buying new devices that can operate in newly authorized spectrum bands. Next Gen presents the Commission with an opportunity to spur innovation without setting aside new bands and without requiring consumers to immediately upgrade their devices.

Broadcasting is special – it is consumers’ main source of trustworthy reporting and local emergency information, and consumers rely on broadcasting to get critical information during natural disasters. This is a reason to *encourage* broadcast innovation, not to stifle it. Broadcasters must be allowed to keep pace with a dynamic and evolving marketplace for video programming. Next Gen TV is how broadcasters will continue to offer and improve on free television for years to come. Without a competitive free, over-the-air option, consumers will be forced to subscribe to costly pay TV services. That would truly be a tax on any household with a TV set.

Sincerely,

Robert J. Wyatt
Chief Technology Officer
Alaska Public Media

Peter A. Sockett
Director of Engineering and Operations
Capitol Broadcasting Company

Mark Spiller
VP for Engineering/Digital Operations
Commonwealth Public Broadcasting

Steve Smith, CSBE
President, Broadcast Technology Consultants
Consultant to Justice Network

Ray Thurber
Vice President, Engineering
E.W. Scripps Company

Michael Englehaupt
Vice President & CTO
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Jason Effinger
Executive Vice President, Chief Digital and Technology Officer
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Trevor Wiseman
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Ray Conover
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William T. Hayes
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Vice President, Technology
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Tribune Broadcasting

Theodore Stoner, P.E.
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Univision Communications Inc.

Craig LeFevre
Director of Technical Operations
WCTE

David Jones
Chief Engineer
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CC:
Chairman Pai
Commissioner O’Rielly
Commissioner Clyburn
Commissioner Carr
Commissioner Rosenworcel